

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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NATIFAH COOPER,

Plaintiff,

**NOTICE OF MOTION FOR  
SUMMARY JUDGMENT**

- against -

14 CV 6136 (PKC) (RLM)

Police Officer PAUL DIEUGENIA Shield No. 13223,  
Police Officer ALEKSANDR PASYNKOV, Tax Id.  
947328 and JANE DOE 1 through 10, individually and in  
their official capacities, (the names John and Jane Doe  
being fictitious, as the true names are presently unknown).

Defendants.

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**PLEASE TAKE NOTICE** that upon defendants' Local Rule 56.1 Statement of Undisputed Material Facts, dated June 7, 2016; the Declaration of Okwede N. Okoh, dated June 7, 2016, and the exhibits annexed thereto; the accompanying Memorandum of Law in Support of City Defendants' Motion for Summary Judgment, dated June 7, 2016, and upon all other pleadings and proceedings herein, defendants will move this Court, at the United States District Court for the Eastern District Court of New York, located at located at 225 Cadman Plaza East, Brooklyn, New York 11201, before the Honorable Pamela K. Chen, on such day when counsel may be heard, for an order pursuant to Rule 56 of the Federal Rules of Civil Procedure granting defendants summary judgment and dismissing all claims in this action.

**PLEASE TAKE FURTHER NOTICE**, that in accordance with the briefing schedule set by Court Order on May 18, 2016, plaintiff is to file opposition papers by June 21, 2016; and defendants' reply is to be filed by June 28, 2016.

Dated: New York, New York  
June 7, 2016

ZACHARY W. CARTER  
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City of New York  
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By: 

Okwede N. Okoh  
Assistant Corporation Counsel

To: VIA HAND DELIVERY  
Robert Marinelli, Esq.